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7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 United States of America,

11 Respondent/Plaintiff,

12 v.

13 Falasha Ali,

14 Petitioner/Defendant.

Case No. 2:06-cr-00160-APG-RJJ

**Motion to Seal (Exhibits A and D)**

15 Falasha Ali respectfully moves this Court for the entry of an Order  
16 permitting him to file (1) Exhibit A under seal because it contains confidential  
17 medical information; and (2) Exhibit D under seal because it contains letters from  
18 minors and letters with personal data identifiers requiring redaction. *See* FED. R.  
19 CIV. P. 5.2(d) and Local Rule IA 10-5; FED. R. CRIM P. 49.1 and Local Rule IC 6-1.

20 While public access to judicial filings and documents is favored, *see Nixon v.*  
21 *Warner Commc'ns, Inc.*, 435 U.S. 589, 597 (1978), a party may have a judicial record  
22 sealed by demonstrating "compelling reasons" that outweigh the public policy  
23 favoring disclosure, including that the records may be used improperly, *see*  
24 *Kamakana v. City and Cnty. of Honolulu*, 447 F.3d 1172, 1178-79 (9th Cir. 2006).

25 In this case, Exhibit A comprises medical records. The record contains  
26 sensitive and private information relating to Mr. Ali's health and medical care.

1 Exhibit D contains letters with personal data identifiers, as well as letters sent from  
2 Mr. Ali's minor children. The records should thus be sealed to protect his privacy  
3 and the identification information of those writing letters of support, including his  
4 minor children.

5 Given the nature of the information provided in Exhibits A and D, Mr. Ali  
6 respectfully asks this Court to permit him to file the exhibits under seal in this Court.

7 Dated April 26, 2021.

8 Respectfully submitted,

9 Rene L. Valladares  
10 Federal Public Defender

11 /s/ Katherine Tanaka  
12 KATHERINE TANAKA  
13 Assistant Federal Public Defender  
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15 IT IS SO ORDERED:

16 Dated: April 29, 2021

17   
18 ANDREW P. GORDON  
19 UNITED STATES DISTRICT JUDGE  
20 Case No. 2:06-cr-00160-APG-RJJ  
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